



Early Journal Content on JSTOR, Free to Anyone in the World

This article is one of nearly 500,000 scholarly works digitized and made freely available to everyone in the world by JSTOR.

Known as the Early Journal Content, this set of works include research articles, news, letters, and other writings published in more than 200 of the oldest leading academic journals. The works date from the mid-seventeenth to the early twentieth centuries.

We encourage people to read and share the Early Journal Content openly and to tell others that this resource exists. People may post this content online or redistribute in any way for non-commercial purposes.

Read more about Early Journal Content at <http://about.jstor.org/participate-jstor/individuals/early-journal-content>.

JSTOR is a digital library of academic journals, books, and primary source objects. JSTOR helps people discover, use, and build upon a wide range of content through a powerful research and teaching platform, and preserves this content for future generations. JSTOR is part of ITHAKA, a not-for-profit organization that also includes Ithaka S+R and Portico. For more information about JSTOR, please contact support@jstor.org.

AWARD UNDER COMPENSATION ACT FOR DISEASE CONTRACTED IN CARING FOR OTHER EMPLOYEES.

The following abstract of a court decision is quoted from the advance sheets of the Pacific Reporter, issue of December 6, 1920:

"A safety engineer employed by a mining company contracted influenza which resulted in an affection of the heart and made it impossible for him to do any but light work. He was awarded compensation by the Industrial Accident Commission, and the Supreme Court of California affirmed the award in *Engels Copper Mining Co. v. Industrial Accident Commission*, 192 Pacific Reporter, 845. Judge Olney wrote the opinion. During the influenza epidemic a considerable number of employees of the mining company were attacked, and it attempted to care for the cases in its hospital and in temporary quarters used for that purpose, among which was the safety engineer's office. Because of the insufficient number of medical attendants and nurses to meet the emergency, the engineer practically gave up his own duties and devoted himself to caring for the influenza patients. He bathed them, gave them food and medicine, attended to their personal wants generally, and for five or six days had the closest personal contact with them. He finally contracted the disease himself, which resulted in his permanent industrial impairment. In discussing the question of voluntary exposure to the danger, the court said:

"It is true that an injury suffered by an employee in voluntarily doing something entirely outside of his employment, even though of benefit to his employer, is not an injury suffered by him in the course of his employment, and, if the facts of this case were only those we have stated, it might be that the award would have to be annulled on that ground. But there was evidence in the case which would justify the commission in believing that the further fact was present that the company's superintendent had directed Rebstock to assist in caring for the company's influenza patients. This fact, for we must take it to be the fact, at once took Rebstock's services in that respect out of the class of purely voluntary services. Although the services were exceptional, and without the usual scope of Rebstock's employment, they were within its actual scope at the immediate time, because rendered in response to the company's direction."